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5th February 2025

FAO Oscar Gallardo
Innova,
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London,
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Re: Phase II Report Addendum

Following the response of the Local Planning Authority (LPA) refusal to discharge Condition 7 with regards to potential contaminated land, we have prepared this addendum report to support the discussion and findings contained within GeoCon Phase II site investigation report dated April 2024 (reference GSI2006 EW PII Report) and in response to the LPA response dated 21st January 2025 (reference P/2024/1151).

We have included within this addendum a drawing titled 'Potential Sources of Contamination' which shows the historical layout of the Royal Ordnance Factory (ROF) and identified potential sources. From the historical mapping and aerial image, the main works are located to the north of the river, with factories and main storage units noted in this area. Given the spacing of the buildings and the visible earthwork bunds surrounding them, this indicates that these were used to store explosive materials, which is the procedure for explosive sites during the WWII era. However, to the south of the river where the proposed development is located, only a small portion (blue line boundary on the plan) contains infrastructure relating to the ROF. This area contains a small number of structures closer together and interconnected by rail and roadways, with no earthwork bunds present surrounding the structures noted on the historical aerial photograph. Further to the south is the connected mainline railway, not shown on the aerial photograph but noted in the Phase I Assessment's historical mapping records.

Given the layout, location between the main ROF area and the southern rail link and the absence of earthworks surrounding structures, it is considered unlikely that this area on site was used for storage or manufacturing of explosive materials and likely associated with locomotive sheds and storage given the positioning between the main ROF area and the railway to the south.

The structures remain present on the site; however, they are stripped and empty, with all railway and other infrastructure historically removed from the site. These structures are proposed to be retained and within the immediate footprint of the buildings no development works are proposed, as was undertaken on the adjacent solar array development to the west.

Therefore, based on this rationale, a site investigation was undertaken on the site, with exploratory boreholes (WS01 to WS07) located within the historical footprint, targeting the areas surrounding the buildings and historical operations (WS01, WS03, WS05 to WS07) or along the route of historical railway which intersects the development area (WS01 and WS04) with remaining locations spread across the site as

general coverage, given the full site indicated to be artificially landscaped within the initial Phase I assessment.

The encountered ground conditions indicated that no Made Ground was present in the investigation locations which would characteristically likely contain contamination from the historical activities. Given the absence of made ground, chemical testing was undertaken on selected samples across the site to prove the absence of impacted materials. Given the justification above, it was considered that undertaking specialist testing for glycols within soils was not required given the findings and ground conditions, and the retainment of the existing structures.

If any development was proposed in the existing structures, such as lifting of floor slabs or identification of drainage runs within them, then glycols would have been considered to ratify the risk. Alongside this, no evidence of burn pits or disposal sites, or any other potentially contaminative feature was encountered during the site investigation, notably no ash containing materials were encountered which were historically used along railway lines during this era.

With regards to potential groundwater contamination, all of the site area adjacent to the river has been undeveloped from the earliest mapping records. Only in the area of the historical ROF activities would be a potential source of contamination. Given the ground conditions encountered in this area indicated a lack of made ground, and superficial deposits over 5.00m thick, and in view of the chemical testing results; it is not considered likely that potential contamination could impact the underlying sensitivity of the Principal Aquifer and the adjacent surface water receptor. Any observed contamination would have resulted in further investigation to understand potential risk to the sensitive Controlled Water receptors.

We have provided this addendum to address the concerns raised by the LPA and are of the opinion that sufficient information has now been provided to discharge Condition 7 on the planning application for the site.

Yours sincerely

Liam Daley

For and on behalf of GeoCon Site Investigations Ltd

Liam Daley

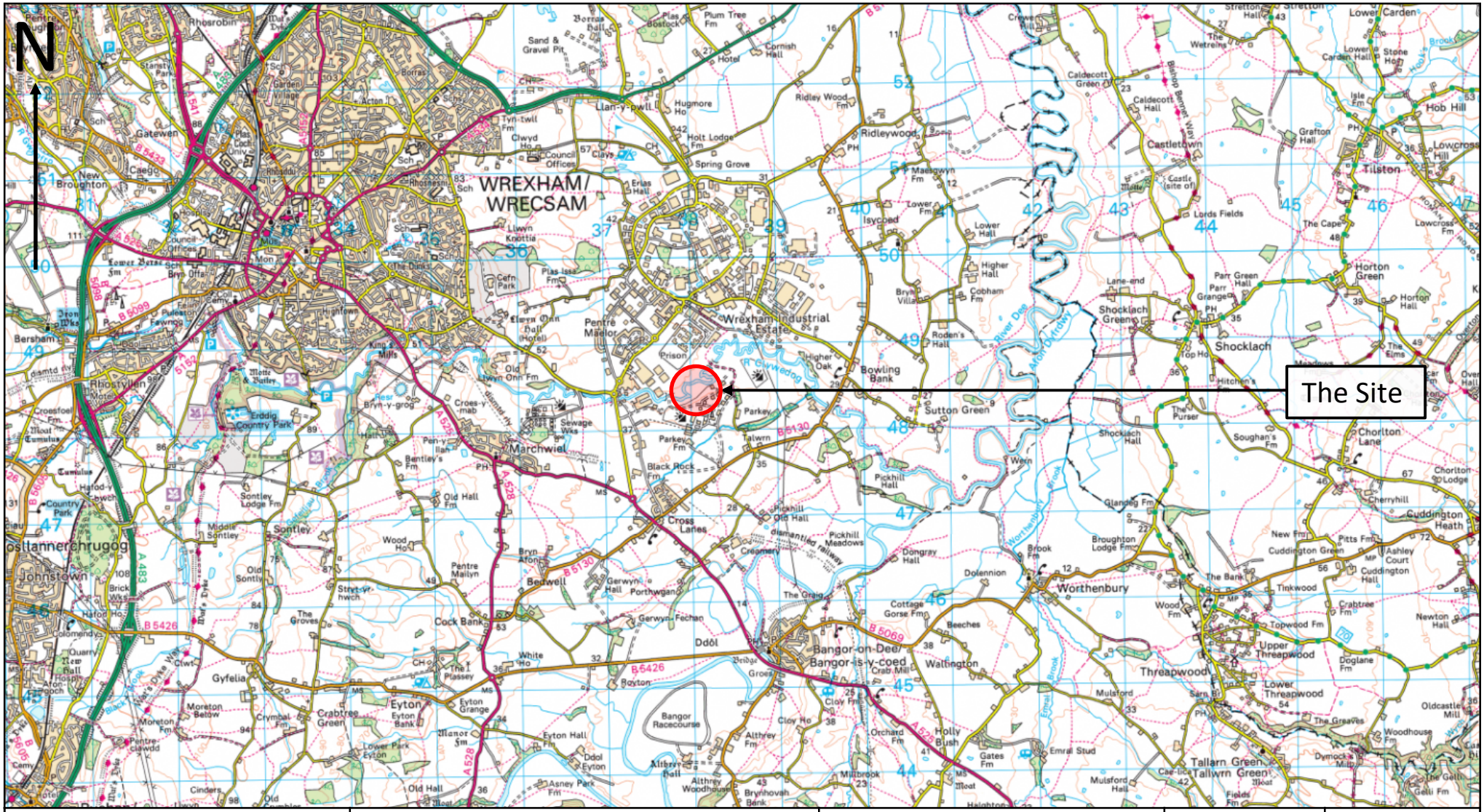
Principal Geoenvironmental Engineer

Document reference: GSI2006_LD_Addendum_050225

Appendix A - Drawings

APPENDIX A

DRAWINGS



GeoCon Site Investigations Ltd
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PROJECT ID	DRAWING NUMBER	SCALE
GSI 2006 Solar Farm, Wrexham	GSI 2006/01	N.T.S
TITLE	**DATE**	**DRAWN BY**
Site Location Plan	December 2023	MP



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PROJECT ID	DRAWING NUMBER	SCALE
GSI 2006 Solar Farm, Wrexham	GSI 2006/02	N.T.S
TITLE	**DATE**	**DRAWN BY**
Exploratory Hole Location Plan	February 2024	EW

Historical Aerial Photography:
ROF Wrexham 1946



Main ROF Factory buildings associated with explosive manufacturing

Earthwork bund surrounding buildings along the roadway network indicating the location of stored explosive ordnance and materials

The Site

Developed area of site: Source of potential contamination- Railway infrastructure and buildings associated with wider Royal Ordnance Factory. Note the lack of earthwork bunds surrounding buildings in this area when compared to the main area to the north of the river. Therefore, given the absence and close spacing of the buildings and location south of the main factory area, it is unlikely that explosives were stored on site and likely to be related to Locomotor sheds and storage, interconnected by rail and road, connecting the ROF to the main railway further to the south. This is typical of MOD sites during this era.

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PROJECT ID	DRAWING NUMBER	SCALE
GSI 2006 Solar Farm, Wrexham	GSI 2006/03	N.T.S
TITLE	**DATE**	**DRAWN BY**
Potential Sources of Contamination	January 25	MP

0 m 50 m 100 m 150 m 200 m 250 m 0 0

Scale Bar
1: 2500

N

ABE/12

Field 1A

Transformer

Access Gate 2

Access Gate 3

Proposed Access Road

Translocated Hedgerow

Transformer

Access Gate 4

Field 1B

Access Gate 1

Field 2

Outflow regulated by orifice set in perforated pipe and into shallow ditch (top width 0.5m - depth 0.2m)

Attenuation swale - top area c 200 m2 (base area 100 m2) - depth 0.5m

Proposed Hedgerow

Access Gate 6

Ancillary Electrical Building

Transformer

1 x ISO Container (6 m) Spares Store

8 x Batteries (12 m) with ancillary infrastructure and metal palisade fence

Field 1C

Additional section of permeable access road

Customer sub with associated enclosure

Access Gate 7

Ancillary Electrical Building

Maintenance Access Gate 5

33 kV line

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Key:

- Planning Application Boundary
- Soil Storage area
- Existing Building
- Cable route
- Shallow ditch
- Soil Bund
- Exising Hedgerow
- Proposed Planting
- Public Right of Way
- Deer fencing
- CCTV
- Attenuation Swale
- Battery store
- Proposed Permeable Access Road
- Existing site roads
- Palisade fence
- Proposed Hedgerow
- Habitat Enhancement
- Inverted soils from scrape construction
- Proposed shallow scrape
- Grass receptor Area

rev: A | date: 19/06/24 | details: (JLB) Annotations updated

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GL54 3LQ
tel: 01285 721072

client:
Novus R S Ltd

project:
Solar Park to the north of Maelor Gasworks

title:
NMA: Secondary Access Road

scale:	date:	drawn by :	checked by:	size:
1:2500	17/06/24	JLB		A3

Project ref :	dwg no:	rev:
258	WR-EX-258-21	A